REMARKS

This Request for Reconsideration is prepared in response to the Office Action mailed on 17 September 2007 (Paper No. 20070911).

It is first noted that the two references relied upon by the Examiner in rejecting the claims of the application have never been cited by Applicant nor the Examiner during the prosecution of the application to date. Accordingly, the Examiner is respectfully requested to cite these two references in form PTO-892, or alternatively, to indicate the Examiner's consideration of these references in the PTO-1449 form attached to this paper.

Claims 1, 6, 7, and 12 have been rejected under 35 U.S.C. § 102 as anticipated by Dillon (U.S. Publication No. 2003/0172264) for the reasons stated in section 3 on pages 2 and 3 of the Office Action. Claims 2-5 and 8-11 have been rejected under 35 § 102 103 as obvious over Dillon in view of Yang-Huffman (U. S Publication No. 2003/0115316) for the reasons stated in section 5 on pages 4-7 of the Office Action.

It is submitted that the present claims are patentable over the cited art, taken either alone or in combination, for the following reasons:

The present invention generally relates to that to access control without changing a presently used version of a system application protocol, an operator enters an ID and a password of the operator for user authentication, and, if the user authentication is successful, the operator will have access to an application layer of a system managed using either TCP/IP or UDP/IP. The application layer is adapted to be accessed using a security module to confirm whether or not an IP address of a terminal used by the operator is a preset IP address. In a network operating a version of a network management interface not equipped with a security function, the security deficiency of the system is alleviated by simply adding the security module without effecting a version upgrade process.

Dillon '264 discloses that an approach for providing integrated firewall and network acceleration functions is disclosed. An integrated firewall and network accelerator filters packets received from a host, according to a security policy, to establish a connection for accelerating the filtered packets over a network (e.g., satellite network). The method further includes selectively triggering establishment of a tunnel (e.g., Virtual Private Network (VPN) tunnel) over the established connection, wherein the filtered packets are encrypted through the tunnel.

Furthermore, Yang-Huffman discloses that the present invention is directed to a system and method for metering Internet usage, including monitoring Internet usage by a customer, logging data processing resource consumption by the monitored Internet usage, and determining a quantity of data processing resource consumption logged within a defined time period by the customer. It will be appreciated that network usage by more than one customer at a time may be logged and tabulated by the system and method.

As noted in the abstract thereof, Dillon relates to a method and system for providing an integrated firewall and network acceleration functions. On the other hand, the present invention is related to a security method for operator access control of a network management system.

While the cited reference performs IP filtering, it does not perform the specifically recited steps of the present claims.

Similarly, the secondary reference is related to a system and method for network usage metering. While the secondary reference may refer to a row in a Management Information Base, it does not perform the specifically recited steps of the present claims.

In more detail, independent claims 1 and 7 related to a security method for operator

access control of an NMS system which supplements this security defect of the NMS system using an application layer.

On the other hand, the filtering and network acceleration in Dillon attempts to improve the network performance in a VPN environment.

Claims 1 and 7 each recites confirming whether or not an IP address of a terminal used by the operator is a preset IP address.

On the other hand, Dillon does not teach this feature but rather only teaches that the packet filtering is used in the firewall.

As to the rejections under 35 U.S.C. § 103, the Examiner argues that the prioritization criteria rule is applied in Dillon.

Applicant disagrees in that one skilled in the art could not conceive of the SNMP packet control method of the present invention only using the prioritization criteria rule used by Dillon because of the fact that the prioritization criteria rule **cannot** be applied to the SNMP packet control method of the present invention.

Furthermore, it is submitted that it would not be obvious to combine the references in the fashion noted by the Examiner since there is no teaching or suggestion in either reference supporting the proposed combinations. Rather, the Examiner has used hindsight based on the teachings of the present application to produce combinations which purportedly meet the recited limitations of the rejected claims.

The Examiner appears to have used circular reasoning in combining references in that the Examiner indicates that adding the feature of the secondary reference deficient in the

primary reference results in a modification which includes the improvement of the secondary reference.

That is, the Examiner has stated a conclusion as a reason.

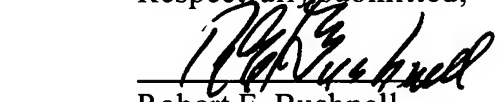
In view of the above, it is submitted that the present claims are patentable over the cited art and should therefore now be in a condition suitable for allowance.

Additional references were cited by the Examiner but not utilized in the rejection of the claims and accordingly, it is submitted that no further comment on these references is necessary.

No other issues remaining, reconsideration and favorable action upon all of the claims now present in the application are respectfully requested. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's undersigned attorney.

No fee is incurred by this Request for Reconsideration.

Respectfully submitted,



Robert E. Bushnell,
Attorney for the Applicant
Registration No.: 27,774

1522 "K" Street N.W., Suite 300
Washington, D.C. 20005
(202) 408-9040

Folio: P56996
Date: 12/17/07
I.D.: REB/HMZ